

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

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|--------------------------|---|----------------------|
| UNITED STATES OF AMERICA | : | |
| Plaintiff, | : | CASE NO. 2:21-CR-237 |
| v. | : | JUDGE SARGUS |
| LEATHA INEZ SAVAGE, | : | |
| Defendant. | : | |

MOTION FOR CONTINUANCE

Defendant, Leatha Inez Savage, through undersigned counsel, respectfully moves the Court for an Order continuing the sentencing hearing currently scheduled on May 19, 2022. The reasons in support of this Motion are set forth in the following Memorandum.

Respectfully Submitted,

/s/ Samuel H. Shamansky
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Counsel for Defendant

MEMORANDUM

This matter is currently scheduled for a sentencing hearing on May 19, 2022, at 9:30 a.m. Unfortunately, Counsel for Defendant will be unable to appear at that time, as he is currently engaged in a multi-defendant jury trial before the Honorable Joel M. Kuhlman in the matter of *State of Ohio v. Jacob Krinn*, Wood County Court of Common Pleas Case No. 2021 CR 0223. The *Krinn* matter involves, *inter alia*, charges for Involuntary Manslaughter arising out of an alleged hazing-related death and is anticipated to last until May 27, 2022. Accordingly, Defendant respectfully requests that the sentencing hearing in this matter be continued to a later date and time convenient to the Court. Counsel for Defendant submits that this Motion is not made for the purpose of needlessly delaying the resolution of this matter and is in the interest of justice.

Respectfully submitted,

/s/ **Samuel H. Shamansky**
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed with the Clerk of Court for the United States District Court for the Southern District of Ohio using the CM/ECF system, which will send notification of such filing to Sheila Lafferty, Assistant United States Attorney, 303 Marconi Blvd., Suite 200, Columbus, Ohio 43215, on May 18, 2022.

/s/ **Samuel H. Shamansky**
SAMUEL H. SHAMANSKY